

# EXHIBIT A

May 26, 2023

*Via email*

Binance

*dpo@binance.com*

Attn: Legal Specialists

**RE: Notice of Dispute; Account Release Demand Letter**

Dear Sir or Madam,

Our firm represents Kirill Pavlovich Medvedev (“**Mr. Medvedev**” or “**Client**”), an individual residing at 2301 Laguna Cir, North Miami, FL 33181, USA, with Binance account associated with email [invest@tenzor.capital](mailto:invest@tenzor.capital).

We are writing to request that you release the account of Mr. Medvedev with Binance and all funds associated with that account (“**Account**”). The Account was locked by you on or about March 17, 2023, without any notice or sufficient explanation.

Background

Mr. Medvedev opened the Account in approximately 2019 and used it for crypto trading activities in full compliance with the rules and policies of Binance. On March 17, 2023 Mr. Medvedev was denied access to the Account, not being able to access the Account, place or cancel any trades, or make withdrawals or deposits. What's even worse, Mr. Medvedev could neither monitor nor control the status of open futures trades for multiple hundred thousand dollars. If closed prematurely at the time of the blocking of the Account, these trades will bring severe losses to the Client solely due to the unexplained and unwarranted decision of Binance to block the Account.

When the Client communicated with Binance support via chat, he got a minimal explanation that his Account was blocked due to an internal account review and suggested to contact an “officer in charge of this case” in court in Madrid, Spain. The support also added that there are no futures positions on the Account, which means that they were likely closed by Binance.

We found out that the funds were frozen because allegedly Mr. Medvedev owned bitcoins, which were used in a failed ICO about 5 years ago that is now the subject of an investigation in Spain. These bitcoins ended up in Mr. Medvedev's wallet after changing at least 5 wallets since the investigated events happened, and were purchased with a legitimate sale-purchase

agreement concluded. Mr. Medvedev is not related in any way to the mentioned fraudulent activities.

Caused Damage

Due to your hasty decision to suspend the Account, Mr. Medvedev cannot manage his accounts and futures positions and withdraw funds needed to pay for living expenses, he incurred financial loss because of closed futures positions and ongoing losses due to inability to manage funds and profit from it.

The Client has already attempted to resolve the situation directly with Binance's customer support to no avail. The support case was assigned Case ID #102131332.

We, therefore, request that you release the Account and reinstate access to Mr. Medvedev's funds.

If this request is left unanswered, it should be treated as a Notice of Claim under the Binance Terms of Use entered between you and Kirill.

Our client further reserves all rights granted to it by law and to avail itself of any enforcement, legal action, or relief available to him in law or equity. Should you have any questions, please address any communications regarding this matter to us as follows:

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Sincerely,

*Filipp Petkevitch*

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Filipp Petkevitch  
Lawyer  
Buzko Krasnov